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[ADDITIONAL COUNSEL ON BRIEF]

Attorneys for Defendant Barclays PLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

STEPHEN MERRITT, Individually and
on Behalf of All Others Similarly
Situating,

Plaintiff,

v.

BARCLAYS PLC, JAMES E.
STALEY, and NIGEL HIGGINS,

Defendants.

Case No. 2:23-cv-09217-MEMF-KS

**DECLARATION OF ADAM S. PARIS IN
SUPPORT OF BARCLAYS PLC'S
MOTION TO DISMISS THE SECOND
AMENDED COMPLAINT**

[Notice of Motion and Motion;
Memorandum of Points and Authorities;
Declaration of Martin Moore K.C.; Request
for Judicial Notice; and [Proposed] Order
Filed Concurrently]

Date: November 13, 2025

Time: 10:00 A.M.

Courtroom: 8B

Judge: Hon. Maame Ewusi-Mensah
Frimpong

1 I, Adam S. Paris, declare and state as follows:

2 1. I am an attorney at the law firm of Sullivan & Cromwell LLP, counsel to
3 Defendant Barclays PLC in this matter. I submit this declaration in support of Defendant
4 Barclays PLC's Motion to Dismiss the Second Amended Complaint. Except for those that are
5 stated upon information and belief, I have personal knowledge of the facts set forth herein, and if
6 called and sworn as a witness, I could and would competently testify thereto.

7 2. Attached as **Exhibit 1** is a true and correct copy of the Brief for United Kingdom
8 as Amicus Curiae, *Morrison v. Nat'l Aus. Bank Ltd.*, No. 08-1191 (U.S. Feb. 25, 2010).

9 3. Attached as **Exhibit 2** is a true and correct copy of the Brief for United Kingdom
10 as Amicus Curiae, *Toshiba Corp. v. Auto. Indus. Pension Trust Fund*, No. 18-486 (U.S. Dec. 4,
11 2018).

12 4. Attached as **Exhibit 3** is a true and correct copy of Plaintiffs' Initial Disclosures,
13 dated August 14, 2025.

14 I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct to the best of my knowledge and belief.

16
17 Executed on September 5, 2025, in Los Angeles, California.

18
19 /s/ Adam S. Paris

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